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15 RBS Securities Inc. and RBS Acceptance Inc.

16 **UNITED STATES DISTRICT COURT**  
17 **CENTRAL DISTRICT OF CALIFORNIA**  
18 **WESTERN DIVISION**

19 NATIONAL CREDIT UNION  
20 ADMINISTRATION BOARD, as  
21 Liquidating Agent of Western Corporate  
22 Federal Credit Union,

23 Plaintiff,

24 vs.

25 RBS SECURITIES INC. *et al.*,

26 Defendants.

27 Case No. CV 11-05887 GW (JEMx)

28 **APPLICATION TO FILE  
DOCUMENTS UNDER SEAL**

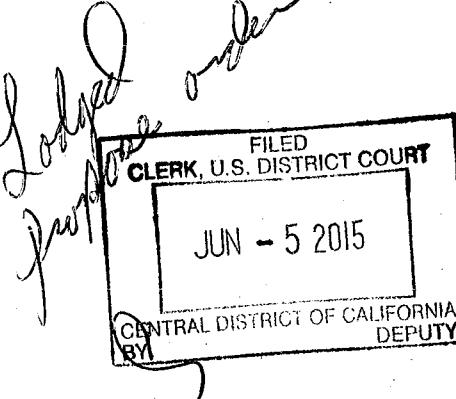
[L.R. 79-5.1]

Judge: George H. Wu  
Courtroom: 10

Complaint Filed:  
July 18, 2011

First Amended Complaint Filed:  
August 19, 2013

Second Amended Complaint Filed:  
November 14, 2014



1 Pursuant to Local Rule 79-5.1, Defendants RBS Securities Inc. and RBS  
2 Acceptance Inc. (collectively "RBS") hereby request permission from the Court to file  
3 under seal the following documents:

4 1. An un-redacted version of RBS's Reply in Support of Motion to Compel the  
5 Production of Compensation Documents, a redacted version of which was  
6 attached as Exhibit 1 to the concurrently filed Notice of Filing of RBS's Reply  
7 in Support of Motion to Compel the Production of Compensation Documents.

8 The Court has entered a Master Protective Order relating to this action. ECF  
9 No. 318. The Master Protective Order states that:

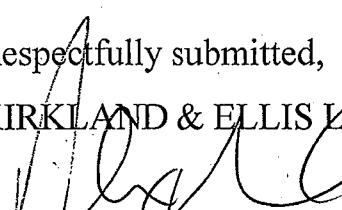
10 In the event that before trial in the Related Actions, or in connection with any  
11 hearing in or any matter relating to the Related Actions, counsel for any Party  
12 determines to file or submit in writing to the Clerk's office any Protected  
13 Material, or any papers containing or making reference to the substance of such  
14 material or information, such documents or portions thereof containing or  
making reference to such material or information shall be filed with a request  
that the documents be filed under seal in accordance with the rules of the Court,  
and kept under seal until further order of the Court.

15 In accordance with Paragraph 9 of the Master Protective Order, RBS requests  
16 that its Reply in Support of Motion to Compel the Production of Compensation  
17 Documents be filed under seal.

18  
19 DATED: June 5, 2015

20 Respectfully submitted,

21 KIRKLAND & ELLIS LLP

22   
23 R. Alexander Pilmer  
24 David I. Horowitz

25 Attorneys for Defendants RBS Securities Inc.  
26 and RBS Acceptance Inc.